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April 19, 2022

Hon. Martin Glenn
Chief Bankruptcy Judge
U.S. Bankruptcy Court
One Bowling Green
New York, NY 10004-4565

Re: Alexander Bernard Kaspar | 22-10382-MG

Dear Chief Judge Glenn:

Our firm is special counsel to the Town of Putnam Valley, a major creditor and party in interest in the above-referenced Chapter 11 case. I learned late yesterday afternoon that a hearing pursuant to 11 U.S.C. Section 362 (c) (3) (B) to extend the automatic stay has been scheduled on three (3) days notice with actual responses due within forty-eight (48) hours.

This Chapter 11 case was filed on March 28, 2022. The Debtor has had twenty-one (21) days to schedule a hearing to extend the automatic stay in a proper manner. Because of the Debtor's dilatory action, the creditors are placed at a tremendous unfair disadvantage to respond to his motion within forty-eight (48) hours.

The motion to extend the automatic stay should have been made on fourteen (14) days notice. The Debtor's failure to follow the Federal Rules of Bankruptcy Procedure has created a crisis for those creditors who may oppose the motion. The Debtor has been accorded a patently unfair advantage.

It should be noted that on March 25, 2022, a hearing was conducted in the New York State Supreme Court, Putnam County wherein the Receiver was formally reinstated. The Town of Putnam Valley appeared in the hearing through its counsel VanDeWater & VanDeWater in support of the Receiver. Mr. Kaspar, through the firm of M. Cabrera & Associates LLC, opposed the motion to reinstate the Receiver. The Receiver was reinstated. After losing in State Court Mr. Kaspar immediately jumped back into Chapter 11 on March 28, 2022, using the Federal Court to avoid a State Court ruling. A clear violation of the Rooker-Feldman doctrine.

The Town of Putnam Valley, if given the opportunity, will vigorously oppose the extension of the automatic stay. The Town of Putnam Valley strongly supported the motion of the U.S. Trustee to dismiss the prior case.

I would respectfully request that the creditors and parties in interest be given until 5:00 p.m. on Monday, April 25, 2022 to respond to the Debtor's motion pursuant to 11 U.S.C. Section 362 (c) (3) (B) and that a hearing be scheduled for either April 26, 2022 or April 27, 2022.

Respectfully,

HANDEL & CARLINI, LLP

/S/ Lewis D. Wrobel, Esq.

By _____
Lewis D. Wrobel, Esq.

/es

